

ARCADIS
10 South Riverside, Suite 1900
Chicago
Illinois 60606
Tel 312.575.3700
Fax 312.775.9322
www.arcadis-us.com

Mr. Sam Borries
On-Scene Coordinator
USEPA Region 5
77 West Jackson Boulevard (SE-5J)
Chicago, IL 60604-3590

Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area Time-Critical Removal Action
Monthly Report (November 2010)

Dear Sam:

Attached is the 17th and final monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area Time-Critical Removal Action (TCRA). This progress report is submitted in accordance with Paragraph 19a of the June 2009 Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action (Docket No. V-W-09-C-925). On August 5, 2009, the United States Environmental Protection Agency (USEPA) determined that future updates on the Former Plainwell Impoundment TCRA project will be included in this monthly report. In accordance with the August 6, 2009 direction of the USEPA, monthly reports will only be submitted electronically. On November 29, 2010 USEPA determined that the final monthly report under AOC V-W-09-C-925 will be submitted on December 15, 2010.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Stephen Garbaciak Jr., P.E.
Vice President

Copies:

Leslie Kirby-Miles, USEPA
Richard Karl, USEPA
James Saric, USEPA
Paul Bucholtz, MDNRE
Jeff Keiser, CH2M HILL
Kathy Huibregtse, ENVIRON

Richard Gay, Weyerhaeuser Company
Martin Lebo, Ph. D., Weyerhaeuser Company
J. Michael Davis, Esq., Georgia-Pacific LLC
Paul Montney, P.E., Georgia-Pacific LLC
Garry Griffith, P.E., Georgia-Pacific LLC
Michael Erickson, P.E., ARCADIS

SEDIMENTS

Date:

December 15, 2010

Contact:

Steve Garbaciak

Phone:

312.575.3750

Email:

steve.garbaciak@
arcadis-us.com

Our ref:

B0064536.0000.00014

**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE
PLAINWELL NO. 2 DAM AREA TIME-CRITICAL REMOVAL ACTION**

REPORT #17, NOVEMBER 2010

**PREPARED BY ARCADIS
DECEMBER 15, 2010
ON BEHALF OF GEORGIA-PACIFIC LLC**

SUBMITTED TO

**SAM BORRIES, ON-SCENE COORDINATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA**

REPORT #17, NOVEMBER 2010

Significant Developments and Activities During the Period

- On November 5, Michigan Department of Natural Resources (MDNRE) submitted to ARCADIS a termination statement for substantive requirements document (SRD) MIU990028.
- On November 15, ARCADIS submitted to United States Environmental Protection Agency (USEPA) the 16th *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area Time-Critical Removal Actions (TCRA)* for October 2010.
- On November 16, USEPA submitted to ARCADIS confirmation that the post-removal site control maintenance and monitoring reports for the former Plainwell Impoundment and Plainwell No. 2 Dam Area TCRAs could be included in one report. The report will follow the format outlined in Section 5.7.4 of the Design Report.
- On November 29, USEPA modified the monthly reporting requirement, as defined by Paragraph 19C of the Administrative Settlement Agreement and Order on Consent (AOC), to require a final monthly report to be submitted on December 15, 2010. No further monthly reporting will be required.

Data Collected and Field Activities Conducted During the Period

- No field activities were performed in November.

Laboratory Data Received During the Period

- During the week of November 1, ARCADIS received analytical data for the individual node samples collected for soil composite samples TS20290, TS20310, TS20322, and TS20337. Table A summarizes the samples collected and received.
- During the week of November 8, ARCADIS received analytical data for the individual node samples collected for soil composite samples TS20346, TS20358, TS20397, and TS20460. Table A summarizes the samples collected and received.
- No data were received during the week of November 15, 22, or 29.
- ARCADIS is not awaiting any analytical data. All data has been received.

Issues Encountered and Actions Taken

- None

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA**

REPORT #17, NOVEMBER 2010

Developments Anticipated During the Next Reporting Period

- In December, ARCADIS is scheduled to submit the Final Construction Completion Report for the Plainwell No. 2 Dam Area TCRA, as described in Section 20 of the AOC.

Updates to the Former Plainwell Impoundment TCRA

- During the week of November 29, ARCADIS performed repairs to an eroded area observed near Removal Area 9B, as described in a memorandum titled *Plainwell Bank Inspection and Repair for Removal Area 9B* submitted to USEPA and MDNRE in October.

Developments Anticipated During the Next Reporting Period for the Former Plainwell Impoundment TCRA

- In December, ARCADIS is scheduled to finalize and submit to USEPA the 2010 Bank Inspection Report, as described in Section 5.6 of the *Final Former Plainwell Impoundment TCRA Design Report*. The 2010 Bank Inspection Report will include information regarding the repair work performed in Removal Area 9B.

Georgia-Pacific LLC
 Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
 Plainwell No. 2 Dam Area TCRA
 Monthly Report #17, November 2010

Table A — Summary of Samples Collected and Data Received in November 2010

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result (mg/kg)	Response Action / Notes
Individual Node Soil Confirmation Samples^a								
TS20290_A7	09.30.09	11.05.10	104489	KAR	RA 2, Grid 3	PCBs	8.0	None
TS20290_B1							1.3 J	None
TS20290_C2							0.33 U	None
TS20290_D4							0.33 U	None
TS20290_E6							9.3 J	None
TS20290_F2							4.0 J	None
TS20310_A6	10.14.09	11.05.10	104489	KAR	RA 3A, Grid 13	PCBs	1.2	None
TS20310_B9							0.83	None
TS20310_C6							0.45	None
TS20310_D6							0.33 U	None
TS20310_E4							0.33 U	None
TS20310_F1							0.33 U	None

See Notes on Page 4

Georgia-Pacific LLC
 Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
 Plainwell No. 2 Dam Area TCRA
 Monthly Report #17, November 2010

Table A — Summary of Samples Collected and Data Received in November 2010

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result (mg/kg)	Response Action / Notes
Individual Node Soil Confirmation Samples^a (cont'd)								
TS20322_A3	10.20.09	11.05.10	104489	KAR	RA 4A, Grid 2	PCBs	0.33 U	None
TS20322_B4							0.33 U	None
TS20322_C8							0.33 U	None
TS20322_D3							0.33 U	None
TS20322_E8							0.33 U	None
TS20322_F9							0.33 U	None
TS20337_A7 [TS20337_DUP_001]	10.26.09	11.05.10	104489	KAR	RA 3A, Grid 10	PCBs	0.33 U [0.33 U]	None [None]
TS20337_B4							0.33 U	None
TS20337_C4							0.33 U	None
TS20337_D1							0.33 U	None
TS20337_E2							0.33 U	None
TS20337_F5							0.33 U	None

See Notes on Page 4

Georgia-Pacific LLC
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 Plainwell No. 2 Dam Area TCRA
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Table A — Summary of Samples Collected and Data Received in November 2010

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result (mg/kg)	Response Action / Notes
Individual Node Soil Confirmation Samples^a (cont'd)								
TS20346_A5 [TS20346_DUP]	06.21.10	11.08.10	KAL599	TAL	Island 2, Grid 8	PCBs	43 [42]	None [None]
TS20346_B4							14	None
TS20346_C3							2.8	None
TS20346_D1							6.0	None
TS20346_E6							1.6	None
TS20346_F3							1.2	None
TS20358_A1	06.22.10	11.08.10	KAL599	TAL	Island 2, Grid 21	PCBs	0.95	None
TS20358_B4							0.66	None
TS20358_C3							0.77	None
TS20358_D5							0.42	None
TS20358_E9							0.16	None
TS20358_F4							0.41	None

See Notes on Page 4

Georgia-Pacific LLC
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA
Monthly Report #17, November 2010

Table A — Summary of Samples Collected and Data Received in November 2010

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result (mg/kg)	Response Action / Notes
Individual Node Soil Confirmation Samples^a (cont'd)								
TS20397_A2	07.22.10	11.08.10	KAL599	TAL	RA 4B, Grid 7	PCBs	0.70	None
TS20397_B2							1.3	None
TS20397_C3							0.27 J	None
TS20397_D1							3.7	None
TS20397_E9							0.50	None
TS20397_F5							0.097 J	None
TS20460_A2	08.31.10	11.08.10	KAL599	TAL	RA 6, Grid 5	PCBs	0.52	None
TS20460_B2							0.038 U	None
TS20460_C2							0.056	None
TS20460_D2							0.040 U	None
TS20460_E5							0.038 U	None
TS20460_F3							0.047	None

Notes:

^a Individual node samples based on eight previously collected composite samples were submitted on 10.22.10 to KAR or TAL for PCB analysis, as described in Section 5.5 of the Design Report. The individual node samples had been stored in a freezer at the Kalamazoo field office since the date of the original composite sampling. Each composite sample was divided into six individual node samples identified by the composite sample number (TS20290, TS20310, TS20322, TS20337, TS20346, TS20358, TS20397, and TS20460) followed by an underscore (_), the removal cell identifier (A through F), and the corresponding node location (1 through 9); for example, TS20290_A7.

* Duplicate samples are shown in brackets.

J - The compound was positively identified; however, the associated numerical value is an estimated concentration only because the compound was identified at a concentration below reporting limit but above the method detection limit.

KAR - KAR Laboratories, Inc.

mg/kg - milligrams per kilogram

PCBs - polychlorinated biphenyls

RA - Removal Area

TAL - TestAmerica Laboratories

U - Compound analyzed but not detected at a concentration above the reporting limit.